

# 800 Response Information Services LLC

Before:

**Marlene H. Dortch, Secretary**

**Federal Communications Commission Washington, D.C. 20554+**

In the Matter of	)
<i>Toll Free Service Access Codes</i>	) WC Docket No. 95-155
Petition of Somos, Inc. For a Declarator	) WT Docket No. 08-7
Ruling Regarding Registration of Text-Enabled	)
Toll-Free Numbers	)

## COMMENTS OF 800 RESPONSE INFORMATION SERVICES, LLC

These Reply Comments are submitted on behalf of 800 Response Information Services, LLC (“800 Response”) in response to the *Public Notice* released November 4, 2016, in the above-referenced docket. In the *Public Notice*, the Federal Communications Commission (“The Commission”) seeks input on a *Petition for a Declaratory Ruling Requiring Registration of Text-Enabled Toll Free Numbers* submitted by Somos, Inc. (“Somos”). 800 Response fully supports the request by Somos and urges the Commission to adopt each of the recommendations put forth in the Somos Petition.

800 Response has been a Responsible Organization (“Resp Org”) since the inception of portability. We have taken an active role in the development of the ATIS Guidelines for Toll-Free Number Administration, as member of the SMS/800 Ad Hoc Committee through the entire duration of SNAC to currently serving as co-chair of the current ATIS/SNAC Committee. Our background and experience as an operating Resp Org and our familiarity with all matters related to Toll Free provides ample expertise and insight into the issues and discussions raised in the Somos petition.

In its Petition, Somos has raised some vital and important points, all of which are consistent with the basic reality that, unlike non-Toll-Free numbers, only the current Resp Org can definitively determine

the identity of the Toll-Free Service Subscriber ("Subscriber"), the entity that controls a given Toll-Free number, and is therefore uniquely qualified to determine Subscribers' desires with respect to text-enabling their numbers. This same basic principal applies to all aspects of Toll-Free assignment, management and Resp Org Changes.

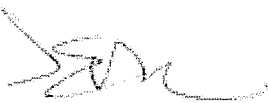
Absent the controls requested by Somos, texting providers have the potential to create confusion and disorder through unauthorized text-enabling of Toll-Free numbers without Subscriber knowledge or consent, enabling spoofing, fraud, and other irresponsible acts; it also would undermine the competitive neutrality that The Commission's number-assignment rules are designed to ensure.

800 Response strongly encourages The Commission to adopt Somos' recommendations to:

- Ensure that Toll-Free numbers are text-enabled only with the authorization of the related Toll-Free Subscribers,
- Assure that unassigned Toll-Free numbers are not used for text-messaging and,
- Declare that a texting provider may enable or disable texting to a Toll-Free number only if it has sought and received appropriate authorization from the controlling Resp Org.

In addition, we agree that the Toll-Free Neutral Administrator's TSS Registry is the ideal mechanism for registering Toll-Free Subscribers' authorization to text-enable their Toll-Free numbers, and that the use of this Registry by all texting providers should be mandatory.

Respectfully submitted,



John Evancie

Vice President

800 Response Information Services, LLC